



3/2/15

## U.S. Department of Justice

United States Attorney  
Southern District of New York86 Chambers Street, 3rd floor  
New York, New York 10007

March 2, 2015

**BY FACSIMILE**The Honorable Michael H. Dolinger  
United States Magistrate Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007Re: *Barone v. United States, et al.*, No. 12-cv-4103 (LAK) (MHD)

Dear Judge Dolinger:

This office represents Defendants the United States of America, Agent Michael Gaeta, Agent Gregorio Miceli, and Agent Michael Trombetta in the above-referenced action. We write respectfully to request a final brief extension of time to file Defendants' reply in support of their motion to dismiss the Amended Complaint and Defendants' opposition to Plaintiff's cross-motion to unseal grand jury materials, from March 3, 2015, to March 6, 2015. See Dkt. No. 66. The reason for Defendants' request is the continuing need for the undersigned counsel to attend to a serious family illness. Because the extension of this deadline necessitates a corresponding adjournment of Plaintiff's deadline to file a reply in support of his cross-motion to unseal grand jury materials, which is currently March 13, 2015, we also respectfully request on behalf of Plaintiff that the Court so-order an adjournment of Plaintiff's deadline to file a reply in support of his cross-motion to March 17, 2015.

The Court granted two previous requests for an extension of these deadlines. See Dkt. Nos. 65, 66. I have conferred with Plaintiff's counsel, who consents to this request.

ENDORSED ORDER  
Application granted.  
Refused  
3/2/15Respectfully,  
PREET BHARARA  
United States Attorney

By:

/s/ Rebecca S. Tinio  
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